

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

LILI SCHAD, Individually and on Behalf of All  
Others Similarly Situated,

Plaintiff,

vs.

HARBINGER CAPITAL PARTNERS LLC,  
HARBINGER HOLDINGS, LLC and PHILIP A.  
FALCONE,

Defendants.

Case No. 1:12-cv-01244-AJN

**NOTICE OF MOTION OF THE PLAINTIFF FOR APPOINTMENT OF INTERIM  
CLASS COUNSEL PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 23(g)**

PLEASE TAKE NOTICE that Plaintiff Lili Schad, on behalf of herself and all others similarly situated, by her counsel, will move this Court on a date and time as may be designated by the Court, at 500 Pearl Street, New York, New York, for an order appointing Zamansky & Associates LLC and Girard Gibbs LLP as interim class counsel. In support of this Motion, Plaintiff submits a memorandum of law and the declarations of Jacob H. Zamansky and Daniel C. Girard. Plaintiff further submits a proposed order to the clerk of court pursuant to Local Civil Rule 77.1.

DATED: March 19, 2012

Respectfully submitted,

**GIRARD GIBBS LLP**

By: /s/Daniel C. Girard  
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